

Serial No.: 09/718,583
Attorney Docket No.: 10005173-1

REMARKS

In response to the Office Action dated May 26, 2005, claims 1 and 10 have been amended. Claims 1-16 are in the case. Reexamination and reconsideration of the application, as amended, are requested.

The Office Action rejected claim 1 under 35 U.S.C. § 112, second paragraph.

In response, the Applicants have amended claim 1 as suggested by the Examiner to overcome this rejection.

The Office Action rejected claims 1-3 and 9-11 under 35 U.S.C. § 102(e) as being anticipated by Sampson et al. (U.S. 6,339,432 B1). Also, the Office Action rejected claims 4-8 and 12-16 under 35 U.S.C. § 103(a) as being unpatentable over Sampson in view of Goldberg et al. (U.S. Patent No. 5,823,879 A).

The Applicants respectfully traverse these rejections based on the amendments to the claims and the arguments below.

With regard to the rejections under U.S.C. 102, the Applicants respectfully submit that Sampson does not disclose, teach, or suggest all of the claimed features. For example, although the examiner alleged that Sampson provides authentication without the use of cookies via a multi-domain token, the Applicants respectfully disagree with this interpretation of Sampson. This is because the multi-domain token mechanism in Sampson is specifically used to ultimately cause the required cookies to be stored on the user's computer.

In particular, Sampson explicitly discloses on col. 5, lines 46-59 that the "...Primary Domain Agent 242 transmits the Multi-Domain Token to the browser, and causes the browser to connect to the Secondary Domain Agent. When the browser connects to the Secondary Domain Agent, the browser transmits a Multi-Domain Token to the Secondary Domain Agent. The Secondary Domain Agent then transmits to Multi-Domain Token Server 208 a request to verify that the Multi-Domain Token represents a user that has been authenticated by access control system 220. Upon receiving from Multi-Domain Token Server 208 a message confirming that the user has been authenticated, the Secondary Domain Agent transmits to the browser access control cookies that are associated with the domain of the Secondary Domain Agent. [emphasis added].

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Also, with regard to amended claim 10, unlike the Applicants' authentication which allows user access without creating domain agent communication between the first server and the plural servers, the authentication method disclosed in Sampson requires, in addition to any involved web servers, a central 'Multi-Domain Token Server' which must have the ability to communicate with the primary server and each of the secondary servers via an additional 'Domain Agent' component. For example, Sampson states that "[S]uch a mechanism is provided by the following components of access control system 220: Primary Domain Agent 242, Secondary Domain Agents 262 and 282, and Multi-Domain Token Server 208. These elements may be servers that cooperate with each other to provide a multi-domain access control system... (see col. 5, lines 17-21 and FIG. 2 of Sampson). Therefore, since all of the claimed elements are not disclosed by Sampson, it cannot anticipate the claims, and hence, the Applicants submit that the rejection should be withdrawn.

With regard to the rejections under 35 U.S.C. 103, even though the combined references do not disclose, teach or suggest all of the Applicant's features, Sampson **cannot** be combined with Goldberg et al. because Sampson teaches away from the Applicants' claimed invention. In particular, as argued above, Sampson requires cookies in order to allow access to the users and the method in Sampson will **not** work without having cookies installed and functioning on the user's machine.

Further, since Sampson actually does in fact require the use of cookies, the intended function of Sampson would be destroyed if the use of cookies were eliminated, like in the Applicants' claimed invention, which is a clear teaching away. Moreover, Sampson would be rendered inoperable if authentication was performed without the use of cookies and user access would always be denied. Thus, when taking the entire disclosure of Sampson into consideration, it is clear that from col. 5, lines 46-59 that Sampson requires "access control cookies", unlike the Applicants' claimed invention. Hence, this "teaching away" prevents obviousness from being established by combining these references. This **failure** of the cited references, either alone or in combination, to disclose, suggest or provide motivation for the Applicant's claimed invention indicates a lack of a prima facie case of obviousness. W.L. Gore & Assocs. V. Garlock, Inc., 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983). (*MPEP* 2143).

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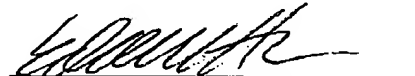
Accordingly, the combined cited references cannot render the Applicant's invention obvious. This failure of the cited references to disclose, suggest or provide motivation for the Applicant's claimed invention indicates a lack of a prima facie case of obviousness (MPEP 2143).

With regard to the rejection of the dependent claims, because they depend from the above-argued respective independent claims, and they contain additional limitations that are patentably distinguishable over the cited references, these claims are also considered to be patentable (MPEP § 2143.03).

In view of the arguments and amendments set forth above, the Applicants respectfully submit that the rejected claims are in immediate condition for allowance. The Examiner is therefore respectfully requested to withdraw the outstanding claim rejections and to pass this application to issue. Additionally, in an effort to expedite and further the prosecution of the subject application, the Applicants kindly invite the Examiner to telephone the Applicants' attorney at (818) 885-1575. Please note that all correspondence should continue to be directed to:

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Respectfully submitted,
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